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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C.

In the Matter of

Implementation of Sections of
the Cable Television Consumer
Protection and Competition Act of
1992

Rate Regulation

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) MM Docket No. 92-266
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REQUEST FOR EXTENSION OF PAGE LENGTH LIMIT

Dow, Lohnes & Albertson, on behalf of its interested cable clients and pursuant to Section 1.429(d) of the Commission's Rules, hereby respectfully requests an extension of the 25-page length limitation in connection with the petition for reconsideration it is preparing with respect to the Commission's Rate Regulation Report and Order, MM Dkt. No. 92-266 (released May 3, 1993) (the "Order").¹ An extension is warranted due to the length and complexity of the Order and regulations, which implicate, among other concerns, the Constitutional rights of cable television operators.

^{1/} It is requested that the Commission waive Section 1.48 to the extent that this request is being filed outside the 10-day period as required by the Commission's Rules. A grant of this waiver would be consistent with the underlying purpose of the waiver request.

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The Order addresses many issues important to the cable industry. The length of the Order and accompanying appendices greatly exceeds the typical length of Commission orders. Because of the many issues petitioners must address, it would be impossible to address them adequately in a 25-page petition for reconsideration.

Moreover, the Order addresses a series of complex issues that are not susceptible to abbreviated analysis. For instance, the benchmark approach adopted to regulate basic service and cable programming rates is highly complex, and composed of a variety of interlocking elements.

For all these reasons, the 25-page limit for petitions for reconsideration is unreasonable. As a consequence, Dow, Lohnes & Albertson respectfully requests permission to submit a petition that does not exceed 100 pages in length, as calculated under the Commission's Rules.

Respectfully submitted,

DOW, LOHNES & ALBERTSON

By: 

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June 14, 1993

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